

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

LOUIS KWAME FOSU,  
Plaintiff,  
V.

THE UNIVERSITY OF RHODE ISLAND,  
UNIVERSITY OF RHODE ISLAND  
BOARD OF TRUSTEES, DAVID M.  
DOOLEY, PRESIDENT, THE  
UNIVERSITY OF RHODE ISLAND,  
DONALD DEHAYES, PROVOST AND  
VICE PRESIDENT FOR ACADEMIC  
AFFAIRS, AND JEANNETTE E. RILEY,  
DEAN, COLLEGE OF ARTS &  
SCIENCES, in their individual and official  
capacities,  
Defendants.

C.A. No. 21-cv-279-JJM-PAS

**DEFENDANTS' RESPONSE TO MOTION  
OF PLAINTIFF'S COUNSEL TO WITHDRAW  
(EXPEDITED CONSIDERATION REQUESTED)**

Defendants state the following in response to the motion to withdraw filed by Plaintiff's counsel (ECF No. 39):

1. Upon the filing of the motion to withdraw during the evening of October 31, 2023 (three days before the filing deadline for Defendant's motion for summary judgment), Defendants learned for the first time that Plaintiff's *pro hac vice* counsel seeks to withdraw their appearances.
2. Previously, on September 28, 2023, Defendants were informed that Plaintiff's Rhode Island counsel intends to withdraw his appearance and that Plaintiff was attempting to retain replacement Rhode Island counsel. The parties filed a stipulation (ECF No. 38) to afford Plaintiff with time to retain replacement Rhode Island counsel. In a Text

- Order dated October 2, 2023, the Court set Defendants' summary judgment filing deadline at November 3, 2023 and Plaintiff's deadline to retain replacement Rhode Island counsel and file his opposition to the summary judgment motion at December 4, 2023.
3. Defendants take no position on the requests of *pro hac vice* and Rhode Island counsel to withdraw their appearances.
  4. Defendants' concerns relate to the status and future scheduling of this litigation.
  5. Defendants respectfully request that the Court enter an Order that (1) stays the current summary judgment filing deadline and (2) requires the filing of an entry of appearance by replacement Plaintiff's counsel or Plaintiff *pro se* by no later than December 4, 2023. If replacement counsel or Plaintiff *pro se* do not file an entry of appearance by the deadline, the Court should dismiss this litigation with prejudice. If replacement counsel or Plaintiff *pro se* timely enters an appearance, Defendants will be prepared to file their summary judgment motion within fourteen (14) days thereafter.
  6. Defendants' counsel is available to confer with the Court to review the recent developments and discuss the future direction of this litigation.

Defendants,

By their Attorney,

/s/ Steven M. Richard

Steven M. Richard (#4403)  
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Dated: October 31, 2023

CERTIFICATE OF SERVICE

I certify that, on the 31st day of October, I filed Defendants' response through the Court's CM/ECF system.

/s/ Steven M. Richard